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ByteDance Inc., ByteDance Ltd.,
TikTok Ltd., and TikTok LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR-TSH

Honorable Yvonne Gonzalez Rogers

**DECLARATION OF GEOFFREY M.
DRAKE IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION PURSUANT TO CIVIL LOCAL
RULE 7-11 FOR AMENDMENT OF
DEADLINES UNDER CASE
MANAGEMENT ORDER 10 AND
OTHER RELIEF**

1 I, Geoffrey M. Drake, declare and state as follows:

2 1. I am a partner at King & Spalding LLP and counsel for Defendants TikTok Inc.,
3 ByteDance Inc., ByteDance Ltd., TikTok Ltd., and TikTok LLC.

4 2. I submit this declaration, as required by Civil Local Rule 7-11, in support of Defendants'
5 Administrative Motion Pursuant to Civil Local Rule 7-11 for Amendment of Deadlines Under Case
6 Management Order 10 and Other Relief.

7 3. Pursuant to Civil Local Rule 7-11(a), the Parties have conferred regarding Defendants'
8 request to remedy the Plaintiffs' failure to timely submit Plaintiff Fact Sheets for Personal Injury and
9 School District Plaintiffs, including through an extension of the deadline under Case Management
10 Order 10 for bellwether discovery selection on April 15.

11 4. The Parties have not reached a stipulation pursuant to Civil Local Rule 7-11(a).
12 Plaintiffs have opposed Defendants' request and Defendants expect they will file an opposition
13 pursuant to Civil Local Rule 7-11(b).

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on April 5, 2024 in Atlanta, GA.

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20 /s/ Geoffrey M. Drake
Geoffrey M. Drake